



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

CERTIFIED MAIL NO.
RETURN RECEIPT REQUESTED

In reply, refer to WST-3-1

Ms. Ann Skanadore
Laboratory Director
Corning Gilbert, Inc.
5310 W. Camelback Road
Glendale, Arizona 85301

Re: Warning Letter and Certification of Violation Correction for Corning Gilbert, Inc.

Dear Ms. Skanadore:

On March 22, 2001, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA) at Corning Gilbert, Inc. (Gilbert) located in Glendale, AZ, U.S. EPA Identification Number AZT 050 010 636. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927].

A copy of the investigation report is enclosed for your information. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and potential violations of the Arizona authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with applicable regulations.

Gilbert's submittal, dated April 2, 2001, adequately addresses the violation of the federally authorized RCRA program noted during the inspection and documents Gilbert's return to compliance with the federally authorized regulations cited in the inspection report. Additional violations of the Arizona hazardous waste program are referred to the Arizona Department of Environmental Quality.

MAIL CODE	WST-3-1	WST-3-1				
SURNAME	Marinette	Holloway				
DATE	5/31/01	5-31-01				

U.S. EPA CONCURRENCES

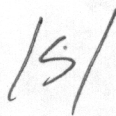
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By copy of this letter, U.S. EPA is providing the State of Arizona with notice of the referenced violation of Subtitle C of RCRA and the Arizona hazardous waste program. U.S. EPA is also providing the State with notice that it intends to take no further enforcement action for the violation noted. The State of Arizona may notify U.S. EPA of its intent to assume or decline responsibility to take further action to address the referenced federal violation.

U.S. EPA routinely provides copies of investigation reports to State agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fifteen (15) calendar days from the date of this letter. U.S. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Gilbert should continue to take the necessary steps to maintain and ensure compliance with all applicable Federal, State and local environmental requirements. If you have questions related to technical aspects of the investigation report or this letter, please contact Kaoru Morimoto at (415) 744-2143.

Sincerely,



Frances Schultz, Chief
RCRA Enforcement Section

Enc:

cc: Laura Malone, ADEQ (w/o enc.)

bc: Reading File WST-3-1
Kaoru Morimoto



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

CERTIFIED MAIL NO.70001670000931230193
RETURN RECEIPT REQUESTED

June 18, 2001

In reply, refer to WST-3-1

Ms. Ann Skanadore
Laboratory Director
Corning Gilbert, Inc.
5310 W. Camelback Road
Glendale, Arizona 85301

Re: Warning Letter and Certification of Violation Correction for Corning Gilbert, Inc.

Dear Ms. Skanadore:

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By copy of this letter, U.S. EPA is providing* the State of Arizona with notice of the referenced violation of Subtitle C of RCRA and the Arizona hazardous waste program. U.S. EPA is also providing the State with notice that it intends to take no further enforcement action for the violation noted. The State of Arizona may notify U.S. EPA of its intent to assume or decline responsibility to take further action to address the referenced federal violation.

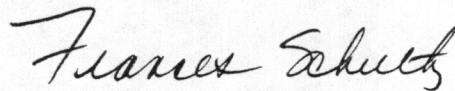
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Sincerely,

A handwritten signature in cursive script, reading "Frances Schultz".

Frances Schultz, Chief
RCRA Enforcement Section

Enc:

cc: Laura Malone, ADEQ (w/o enc.)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

WASTE MANAGEMENT DIVISION
RCRA ENFORCEMENT SECTION

Purpose:	RCRA Compliance Evaluation Inspection
Facility:	Corning Gilbert Inc. (previously Gilbert Engineering, Inc.)
Facility Mailing Address:	5310 W. Camelback Road Glendale, Arizona 85301
EPA ID Number:	AZT 050 010 636
Date of Investigation:	March 22, 2001
EPA Representatives:	Kaoru Morimoto (415) 744-2143 Robin Holloway (415) 744-2043
Facility Representatives:	Ann Skanadore Laboratory Director (623) 245-1050, ext. 291 Dan Reeves Waste Treatment Supervisor (623) 245-1050
State Representative:	Carol Hibbard Compliance Officer (602) 207-4114
Report Prepared By:	Kaoru Morimoto
Date of Report:	May 4, 2001

Background:

Gilbert Engineering Co., Inc. located in Glendale, Arizona, was a subsidiary of Oak Industries, Inc. until it was purchased by Corning, Inc. last year. The company is now called Corning Gilbert Inc. (herein referred to as "Gilbert" or "the facility"). In operation over 30 years, Gilbert is the largest manufacturer of cable connectors, operates five (5) days/week, and employs 600 people. A diagram of the facility is provided as Attachment #2.

From bar stock (teflon, aluminum, brass, etc.), Gilbert manufactures 7,000 component parts. Wastes generated from the manufacturing process includes plating wastes (F006) and used oil.

The most recent notification form, submitted March 30, 2001, reflected the facility name change and indicated that Gilbert was a large quantity generator of hazardous waste. During the inspection the inspectors confirmed Gilbert's large quantity generator status from the review of Gilbert's manifests.

During the in-brief, the inspectors provided the facility with a copy of the Small Business Regulatory Enforcement Fairness Act (SBREFA) Fact Sheet.

Investigation:

On March 22, 2001 a RCRA Compliance Evaluation Inspection (CEI) was conducted by inspectors from the United States Environmental Protection Agency (U.S. EPA), accompanied by a representative from the Arizona Department of Environmental Quality (ADEQ). The purpose of the inspection was to determine the compliance of Gilbert with hazardous waste regulations in 40 Code of Federal Regulations (CFR) Subtitle C and the regulations adopted by the Arizona authorized program under RCRA Subtitle C in Arizona Administrative Code (AAC), Title 18, Chapter 8, Article 2.

A CEI of Gilbert was previously conducted by ADEQ on December 1, 1998. No violations were noted during that inspection.

Processes:

Oily filters and sludge are generated from the machinery which manufacture the various connector components and from units that spin the metal scrap chips. The used oil is taken to the used oil storage area, located outside the maintenance area, and stored in one of two tanks (500-gallon and 1,000-gallon capacities). Thermo Fluids generally collects the used oil weekly. The filters are picked up by Romic.

The wastewater generated from the plating operations is either hard-piped or channeled via a trench (tin line rinses and lab cleaner rinses) to the wastewater treatment area. After treatment, the F006 sludge is stored in a 20-cubic yard container. This waste stream is shipped to World Resources Company.

Site Inspection:

Various Machining Areas:

Water soluble coolants, containing approximately 10% oil, are used in the machining processes which manufacture the various connector components. No potential violations were noted in any of these areas.

Main Plating Shop:

This area contained a tin plating line and two chemical film lines. No potential violations were noted.

Plating Laboratory Area:

Small items are plated in this area. No potential violations were noted.

Gold Plating Room:

Small parts are plated with gold in this area. No potential violations were noted.

Analytical Laboratory:

All of the laboratory sinks are hard piped to the wastewater treatment area. No potential violations were noted.

Wastewater Treatment Area (titled "Waste Treatment Area" on the facility diagram):

All of the wastewaters generated from the various operations are treated in this area. The clean treated water resulting from the wastewater treatment process is re-used in the grinding rooms and the plating areas. The filter cake generated from the two filter presses (at the time of the inspection, the larger unit was not operational) is placed in a 20-cubic yard container located adjacent to the loading dock. No potential violations were noted.

90-Day Storage Area (at wastewater treatment area):

There was no waste stored at this location at the time of the inspection (see Photograph #1). No potential violations were noted.

90-Day Storage Area (near receiving dock):

The rainwater that collects in this area is pumped to the wastewater treatment area. There was one 20-cubic yard container containing F006 filter cake at this location (see Photograph #2). The inspectors noted that there wasn't an emergency communication device in this area. The inspectors also recommended placement of a fire extinguisher and an eye wash

unit near this area.

Subsequent to the inspection, the facility representatives informed EPA that the forklifts which are used to transport the F006 filter cake to the 20-cubic yard container are equipped with fire extinguishers.

Used Oil Storage Area:

There were two above-ground used oil storage tanks at this area (500-gallon and 1,000-gallon capacities) surrounded by a secondary containment berm. At the time of the inspection the tops of both tanks were open and the secondary containment berm surrounding the two tanks contained approximately 2" of oil (see Photographs #3-4). There were also two 55-gallon containers of "waste oil" and at least eight open 5-gallon containers and bins containing various amounts of used oil and used oil filters around this area (see Photographs #5-7). While the area had several "Used Oil" signs, none of the tanks, containers, or bins were marked with the words "Used Oil."

The problems noted in this area were forwarded to ADEQ's Solid Waste section by the ADEQ inspector subsequent to the inspection.

Record Review:

Manifests:

The hazardous waste manifests and associated land disposal restriction notification forms from January 2000 to present were reviewed. No potential violations were noted.

1999 Biennial Report:

No potential violations were noted.

Weekly Inspection Records:

The weekly inspections from January 2000 to date were reviewed. No potential violations were noted.

Training:

The training plan, position descriptions, and training records were reviewed. No potential violations were noted.

Contingency Plan:

The plan was currently being updated to reflect the new company name and other changes. No potential violations were noted.

Potential Violations:

A.A.C. R18-8-265 Whenever hazardous waste is handled, personnel must have immediate
40 CFR §265.34(a) access to an internal alarm or emergency communication device, either
 directly or through visual or voice contact with another employee.

The inspectors noted that an emergency communication device was not available at the 90-day storage area adjacent to the loading dock.

Subsequent to the inspection, the facility submitted documentation (see Attachment #3) which stated that personnel will now be required to have two-way radios or a waste treatment operator with them when hazardous waste is brought to the storage area.

Potential Violations Pursuant to Arizona Revised Statutes § 49-802: Pursuant to Arizona Revised Statutes § 49-802, the department [ADEQ] shall administer 42 United States Code § 6935, as amended on January 1, 1997, as the used oil program for this state [Arizona]. For that purpose, 40 CFR part 279, as amended on January 1, 1997, is adopted by reference.

40 CFR § 279.22(a): Used oil shall not be stored in units other than tanks, containers, or units
 subject to regulation under parts 264 or 265 of this chapter.

The inspectors noted that used oil was stored in the secondary containment berm surrounding the above-ground used oil storage tanks.

40 CFR § 279.22(c)(1): Containers and above-ground tanks used to store used oil must be
 labeled or clearly marked with the words "Used Oil."

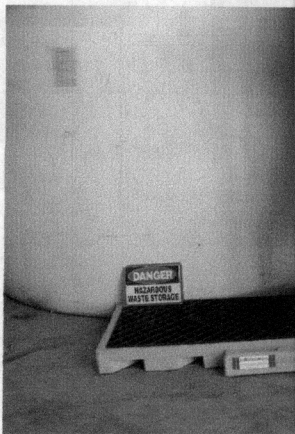
The inspectors noted that none of the tanks, containers, or bins at the used oil storage area were marked with the words "Used Oil."

Attachments:

1. Photographs #1-7
2. Facility Diagram
3. Gilbert memorandum, dated April 2, 2001

ATTACHMENT #1

PHOTOGRAPHS #1-7

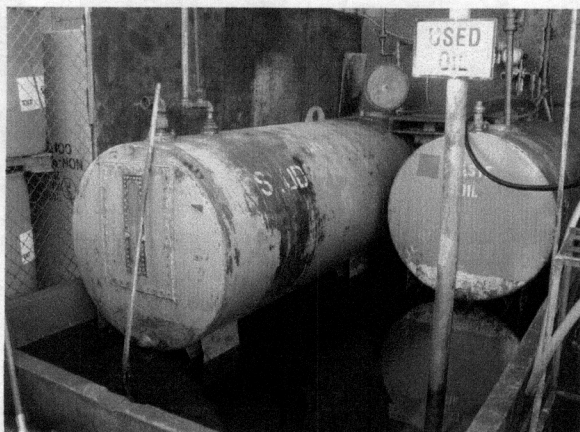


Photograph #1: 90-day storage area at waste treatment plant

from our file



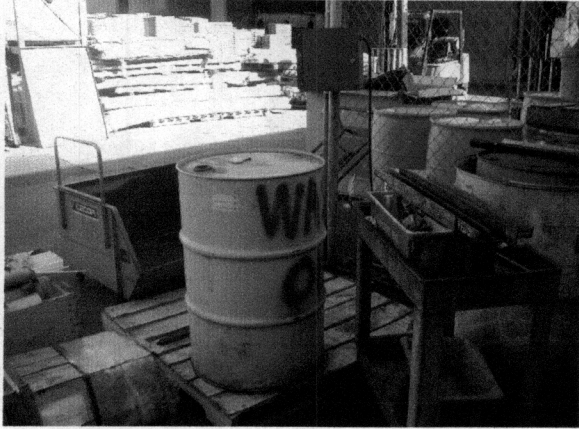
Photograph #2: 20-cubic yard bin containing F006 hazardous waste (foreground) at 90-day storage area



Photograph #3: Used oil storage tanks (500-gallon and 1,000-gallon capacities. Both tanks are open and full. Secondary containment area contains used oil (approx. 2" deep).



Photograph #4: Same area, different angle.



Photograph #5: Full, open 55-gallon container marked as "waste oil" containing used oil (center). Full, open 55-gallon container in yellow secondary containment unit containing used oil (right side). Containers are located adjacent to the used oil storage area.



Photograph #6: Open bins and 5-gallon containers containing used oil and spent filters. Containers are located adjacent to the used oil storage area.



Photograph #7: Several open, 5-gallon containers containing used oil. Containers are located adjacent to the used oil storage area.

ATTACHMENT #2

FACILITY DIAGRAM

APPENDIX 7

CAMELBACK

ORANGE

* - EMERGENCY COORDINATOR MEETING LOCATION

GILBERT ENGINEERING
5310 W. CAMELBACK RD.
GLENDALE AZ. 85301
PHONE: 623-245-1050
FAX: 623-435-5448

ATTACHMENT #3

FACILITY'S APRIL 2, 2001 MEMORANDUM

**GILBERT
ENGINEERING**

April 2, 2001

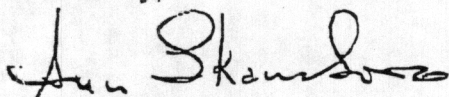
Mr. Kaoru Morimoto
RCRA Enforcement Section
Mailcode: WST-3-1
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Kaoru:

In following up on our conversation from last week, I wanted to update you on the concerns and issues you had when you were here. I have verified with maintenance that Corning Gilbert's forklifts have fire extinguishers on them. The waste treatment operators always have the forklift when loading the F006 waste into the hopper. We have, however, installed a permanent fire extinguisher in close proximity of the F006 hazardous waste. We have issued two-way radios to both waste treatment operators and instructed them early last week to wear them every time they go out to dump the hazardous waste into the bin. Following is the updated version of this procedure. This procedure is in the "Hazardous Material Handling Training" portion of the Waste Treatment Guideline Book. I have faxed over only the last page where the update has been made in the procedure.

Should you have any questions, please feel free to call me at (623) 245-1050 ext. 291.

Sincerely,



Ann Skanadore
Lab Director

AS:lac

Attachments: 'Hazardous Material Handling Training' partial procedure

Revision Date: 03/23/01

Any skin that comes in contact with hazardous materials must be flushed immediately with water first, then neutralized with the appropriate chemical. Any burns or breaks in the skin, must be reported to the tool crib immediately. When in doubt, notify the tool crib of any injury. This is the posted procedure on the bulletin board for first aid.

If there are any questions about how an item is to be decontaminated, the waste treatment supervisor or the Laboratory Director must be advised Before preceding.

Section 3: Preparedness and Prevention of the 90 Day Hazardous Waste Storage Area

When unloading the sludge hopper into the 90 Day storage roll off, the waste treatment operator must carry a two way radio with him to provide internal communication in case of an emergency. In place of the radio, a second waste treatment operator must go to be a notifier in case of an emergency.